



WWW.RIVKINRADLER.COM

926 RXR Plaza  
Uniondale, NY 11556-0926  
T 516.357.3000 F 516.357.3333

**MICHAEL VANUNU**

Partner  
(516) 357-3337  
[michael.vanunu@rivkin.com](mailto:michael.vanunu@rivkin.com)

June 30, 2025

**VIA ECF**

Honorable Joseph A. Marutollo  
United District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Ins. Co. et al. v. Stoyanovsky, et al.*  
Case No.: 1:24-CV-01017-PKC-JAM

Dear Judge Marutollo:

As the Court is aware, we represent Plaintiffs (collectively “GEICO” or “Plaintiffs”) in the above-captioned action. We submit this letter, jointly with the defendants (collectively, with Plaintiffs, the “Parties”), to provide the Court with a status update on this matter. See Min. Entry. Dtd. May 13, 2025.

As an initial matter, Defendants have produced a copy of the 2021 and 2022 tax returns that were filed, as required by the Court’s May 13<sup>th</sup> Order. See Id. In addition, the Parties have been scheduling the depositions of both Parties and non-parties, to the extent permitted under the current stay of certain deposition. See Dkt. Order Dtd. May 12, 2024. The Parties already have three confirmed depositions during the month of July and will attempt to conduct as many depositions as possible prior to the August 10, 2025, when the current stay is lifted.

We thank the Court for its time and continued attention to this matter.

Very truly yours,

RIVKIN RADLER LLP  
/s/ Michael Vanunu  
Michael Vanunu

Cc: All Counsel Via ECF